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TONY ARCHULETA-PERKINS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

TONY ARCHULETA-PERKINS,
Defendant.

Case No.: CR24-00360 JSC

Judge: Hon. Jacqueline Scott Corley

**STIPULATION TO CONTINUE
SENTENCING DATE**

Current Sentencing Date:

April 23, 2025

Proposed Sentencing Date:

May 21, 2025

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorney Nikhil Bhagat, and defendant Timothy Archuleta-Perkins (“Defendant”), by and through his counsel of record, Kenneth P. White, hereby stipulate and ask this Court to find that the sentencing date in this matter, currently set for April 23, 2025, may be continued to May 21, 2025.

1 The stipulation is based on the following good cause: Defense counsel Kenneth
2 P. White is engaged in a jury trial in San Diego County Superior Court for the
3 remainder of April 2025. The trial is in progress and will not settle. The trial was
4 delayed and has continued longer than counsel anticipated, both preventing counsel
5 from travelling to San Francisco on April 23rd and interfering with counsel's ability to
6 prepare for sentencing. In addition, counsel for the government and counsel for
7 Defendant are engaged in discussions that they hope may simplify some of the
8 restitution and forfeiture disputes that will be before the Court and believe the
9 continuance will help clarify and narrow those issues.

10 Therefore, the parties respectfully request that the Court grant the continuance
11 as stipulated.

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13 DATED: April 16, 2025

Respectfully submitted,

BROWN WHITE & OSBORN LLP

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15 By s/Kenneth P. White

16 KENNETH P. WHITE
17 Attorneys for Defendant
TIMOTHY ARCHULETA-PERKINS

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20 DATED: April 16, 2025

OFFICE OF THE U.S. ATTORNEY

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22 By s/Nikhil Bhagat (with permission)

23 NIKHIL BHAGAT
24 Attorneys for Plaintiff
25 UNITED STATES OF AMERICA
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